

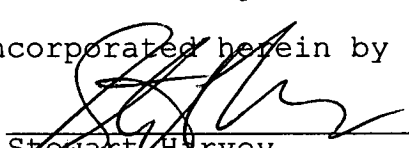
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA '08 MJ 8258

UNITED STATES OF AMERICA)	Magistrate Case No.:
)	
Plaintiff,)	COMPLAINT FOR VIOLATION OF
)	
v.)	21 U.S.C. § 952 and 960
)	Importation of a Controlled
Inez Marie PARQUETTE (1))	Substance (Felony)
)	
Thomas PARQUETTE (2))	
)	
Defendants.)	

The undersigned complainant being duly sworn states:

That on or about March 22, 2008 within the Southern District of California, defendants Inez Marie PARQUETTE and Thomas PARQUETTE, did knowingly and intentionally import approximately 10.40 kilograms (22.88 pounds) of heroin, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Stewart Harvey
Special Agent
U. S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 24th DAY OF MARCH 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

SUF

1 UNITED STATES OF AMERICA

2 v.

3 Inez Marie PARQUETTE (1)

4 Thomas PARQUETTE (2)

5 STATEMENT OF PROBABLE CAUSE

6 I, Special Agent Stewart Harvey, declare under penalty of perjury, the
7 following is true and correct:

8 On March 22, 2008, at approximately 2150 hours, Inez Marie PARQUETTE and
9 Thomas PARQUETTE attempted to enter the United States through the Calexico,
10 California West Port of Entry. Inez Marie PARQUETTE was the driver and Thomas
11 PARQUETTE was the passenger of a 1995 Chrysler Cirrus bearing California
12 license plate 4NAM297.

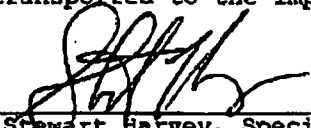
13 Primary Customs and Border Protection Officer (CBPO) Alvarado received a
14 negative Customs declaration from Inez Marie PARQUETTE and Thomas PARQUETTE.
15 When asked who the registered owner of the vehicle was, Mrs. PARQUETTE stated
16 the vehicle belonged to Thomas PARQUETTE's friend, Francisco Lopez. CBPO
17 Alvarado then instructed Mrs. PARQUETTE to open the trunk of the vehicle.
18 Mrs. PARQUETTE then attempted to pull the trunk lever but was unable to open
19 the trunk of the vehicle. CBPO Alvarado then observed Mrs. PARQUETTE become
20 very nervous during primary inspection. CBPO Alvarado then returned to the
21 Treasury Enforcement Communications System (TECS) terminal and noticed the
22 vehicle had a negative crossing history. CBPO Alvarado then referred Mr.
23 PARQUETTE, Mrs. PARQUETTE and the vehicle to the vehicle secondary lot for
24 further inspection.

25 While at the vehicle secondary inspection lot, CBPO Hernandez received a
26 negative Customs declaration from Mrs. PARQUETTE and Mr. PARQUETTE. When
27 asked who the vehicle belongs to, Mr. PARQUETTE stated the vehicle belonged to
28 his friend and he was not sure of his name. When asked if they had ever
traveled to Mexico, both occupants stated they had never traveled to Mexico
before. During questioning, CBP Canine Enforcement Officer Leon conducted a
sweep of the vehicle with his Narcotic Detector Dog (NDD) "Shooter", which
resulted in a positive alert to the dashboard of the vehicle.

Upon further inspection of the vehicle, CBPO Hernandez discovered
twelve (12) packages containing a white powdery substance, which field-
tested positive for heroin. A total of 10.40 kilograms (22.88 pounds)
of heroin were concealed in a non-factory compartment located in the
dashboard of the vehicle.

Inez Marie PARQUETTE and Thomas PARQUETTE were arrested in
violation of 21 U.S.C. § 952 & 960, Importation of a Controlled
Substance. Both defendants were then transported to the Imperial County
Jail for processing.

Executed on 03/23/08 @ 1400 hours.


Stewart Harvey, Special Agent
U. S. Immigration & Customs Enforcement

On the basis of the facts presented in this probable cause statement
consisting of 2 pages, I find probable cause to believe that the defendant
named in this probable cause statement committed the offense on 03/22/08 in
violation of 21 U.S.C. §§ 952 & 960.


United States Magistrate Judge

3/23/08, 1455 hrs
Date/Time